

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

## **JOINT STATUS REPORT**

Pursuant to Local Rule 116.5(a), the parties hereby file the following status report prepared in connection with the status conference scheduled for December 10, 2018.

### (1) Automatic Discovery/Pending Discovery Requests

The Government has provided automatic discovery. The parties are in the process of arranging a time for the defense team to review contraband discovery at the offices of Homeland Security. The defendant is reviewing the provided discovery materials and does not yet know whether he will make additional discovery requests.

(2) Additional Discovery

The Government does not anticipate providing any additional discovery at this time, in the absence of a particular request.

(3) Timing of Additional Discovery Requests

At this time, the parties do not anticipate the need for further discovery to be produced.

#### (4) Protective Orders

No protective orders are anticipated by the parties.

## (5) Pretrial Motions

It is premature to decide whether the defendant will file any pretrial motions under Fed. R. Crim. P. 12(b).

(6) Expert Discovery

The Government agrees to provide any expert witness disclosures 21 days prior to trial. The Defendant agrees to provide any expert witness disclosures 14 days prior to trial.

(7) Speedy Trial Act

All of the time has been excluded from the defendant's initial appearance through the date of the initial status conference scheduled for August 13, 2019. The parties request that the time be excluded until the interim status conference.

(8) Next Status Conference

Given all of the foregoing information, the parties request that the initial status conference, scheduled for August 13, 2019, be canceled. The parties request an interim status conference in approximately 45 days.

Respectfully submitted,

ANDREW E. LELLING  
United States Attorney

/s/ Cara McNamara  
Assistant Federal Public Defender

By: /s/ Anne Paruti  
Assistant U.S. Attorney

Dated: August 12, 2019

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served a copy of the foregoing upon all counsel of record by electronic filing notice.

/s/ Anne Paruti  
Assistant U.S. Attorney

Dated: August 12, 2019